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VIA ELECTRONIC FILING

March 31, 2009

Marlene H. Dortch, Secretary
Federal Communications Commission
455 12th Street, SW
Washington, D.C. 20544

Re: Report on Rural Broadband Strategy – GN Docket 09-29

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 1.1206(b), I am electronically providing this notice of an *ex parte communication* to report that I, counsel to iClick2Media, Inc. and AlphaStar International Inc, along with Malik Shakur, President of iClick2Media, and Michael Wahba of AlphaStar met with Melissa Kinkel, Matthew Warner, Jennifer Prime and William Kehoe of the Wireline Competition Bureau; and Peter Trachtenberg, Chelsea Fallon, Charles Mathias and Christine Clearwater of the Wireless Telecommunications Bureau on March 27, 2009.

During the meeting, Mr. Wahba and Mr. Shakur reiterated what was filed in their comments in the proceeding on Wednesday, March 25. Specifically, they urged the members of the Commission charged with coordinating with the United States Department of Agriculture Rural Utilities Services to ensure that the interests of small businesses with unique technologies are given ample opportunity to apply and be considered for stimulus broadband grants and loans. Specifically, Mr. Wahba expressed that if awarded, he hopes to relaunch his company AlphaStar to be a satellite backhaul service that would provide the answer to third party wireless and terrestrial broadband service providers wanting to link various aspects of their physical network together. Mr. Shakur shared that through a relationship with AlphaStar and using AlphaStar's satellite backhaul, iClick2Media would be able to provide informational, entertainment and educational content to mobile devices to rural, unserved and underserved communities in remote areas. Mr. Wahba shared the attached articles with the staff members present.

Regards,

Jeneba Jalloh Ghatt

Jeneba Jalloh Ghatt
Counsel for iClick2Media, Inc.
And Alphastar International, Inc.

A Hybrid Rural Delivery Network for Broadband Stimulus AlphaStar(R) & CTC Build Unique WiMAX 4G System

Website

INDEPENDENCE, Mo., March 12 /PRNewswire/ -- AlphaStar International, Inc. and Computers & Tele-Comm, Inc. (CTC) announced today a unique joint venture to provide very high speed WiMAX 4G services for any area anywhere across the entire USA. According to CTC President, Graeme Gibson, "*The Digital Divide just got smaller. Today with this announcement, rural areas with no access to broadband fiber finally have a solution to getting connected at 4G speeds. Our mutually developed hybrid model takes advantage of the AlphaStar Teleport, a facility originally built by the U.S. government as part of President Reagan's Star Wars initiative. AlphaStar (tour) can track any area of the USA including Hawaii and US territories to deliver true 4G speeds. Costs are contained by using the satellite primarily for the backhaul of Internet bandwidth.*" Bandwidth is then relayed by ground based WiMAX transmitters although the system can also serve to supply Metro WiFi systems or be used for mobile and maritime applications as well as Disaster Recovery and homeland security purposes. Low cost radios can be used rather than a two-way satellite receiver at customer locations. The Teleport can also deliver video and audio streaming. By caching the AV streams and large portions of the internet locally at the WiMAX transmitter performance is dramatically improved at affordable cost.

President Obama approved over \$7 billion to foster rural and accelerated urban broadband infrastructure. Gibson continued, "By partnering with AlphaStar, we can build complex projects in areas that nothing else can reach. The intent of Congress was to make broadband access available to the rural United States regardless of population densities and economic feasibility. This system marries the *go anywhere* capability of direct broadcast satellite backhaul with CTC's low cost WiMAX distribution of services on the ground, a perfect marriage for fast deployment and building bridges over the digital divide." The partnership will help local government, companies, and organizations applying for grants and loans from the stimulus to make their funding go much further. **John Wahba** of AlphaStar pointed out "The hybrid model can be deployed within weeks to months (depending on scope), serves underserved and unserved areas, and offers immediate employment as intended by the legislation. The model is scalable and allows other rural ISP's to join the effort including wireless, rural Telco's and cable companies and we welcome them to our partnership."

Organizations and groups can now download the CTC authored Rural Reference Model. This model will help operators in their planning and budgeting process as it supplies baseline references, technical capability, and integration with other systems. Gibson added: "Our approach is quite broad, we intend to be able to invite many projects and
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ISP Fixed Wireless

Archive

Cutting the Tie that Binds

TeleCrossing.net is launching a hybrid satellite/fixed wireless solution that bypasses all wireline connections and should sell to consumers for about the same as basic DSL. The company is looking for ISP partners.

by Gerry Blackwell
 [October 20, 2000]

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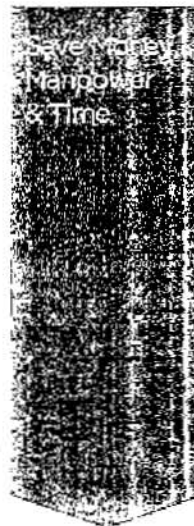
One of the nice advantages of using fixed wireless for broadband access if you're an ISP is that it gets you away from reselling DSL services from the local exchange carrier (LEC), who also just happens to be your competitor.

Trouble is, you likely still have to deal with the LEC or some other giant wireline telecom entity, also a competitor, to get a connection to the Internet backbone.

But now there's a company that promises to cut ISPs free forever from the wireline carriers and all their hassles and competitive conflicts.

Greenwich CT-based TeleCrossing.net, a reincarnation of Alphastar International, the defunct DTH (direct-to-home) satellite broadcaster, is using a hybrid satellite and fixed wireless system to deliver end-to-end, wire-free high-speed Internet service.

Founder and president Mahmoud Wahba claims the company's hybrid system



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provides the bandwidth of fiber and will be more reliable and accessible than DSL or cable. It can also make use of multicasting technology to enable high-quality streaming media services.

Undividing the disenfranchised
TeleCrossing is targeting "Internet and intranet users who are unserved, underserved, dissatisfied with cable and DSL or among the disenfranchised who fall in the digital divide."

Unlike some other satellite-based Internet services, this one is two-way, though asymmetrical---that is, there's more bandwidth coming down to the customer site than going back up to the Net.

The first satellite-based services required---still require---subscribers to use a phone line for the uplink.

Service range
The entry-level service from TeleCrossing is 384 Kbps down, 128 Kbps up, priced at about \$40 in most places---it will vary from market to market.

The company also provides T1 connections to business at competitive rates---Wahba mentions a range of \$300 to \$700. We're betting that won't be competitive for long.

And it can provide very high-speed connections---up to 155 Mbps if the demand is there---using single-channel point-to-point satellite links.

Seeking partners
TeleCrossing is looking for ISP partners to help it distribute the service across the country, although Wahba admits that some details of how it will work with service providers have yet to be worked out.

"We have contacted a lot of ISPs," he says. "We wanted to understand the market first. We were ready to talk, but we have not deployed [the service through an ISP] yet."

The first ISP partners could be operational within a month, though, he says. Some negotiations are down to "legalese."

The company has been operating

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experimental systems from seven POPs in the northeast—in Connecticut, New York City, New York state, and New Jersey—with about 350 customers up and running.

Technical strategy

It's currently using half a transponder on GE-5, a General Electric-owned satellite that covers North America. In terms of data throughput, this provides about 15 Mb.

TeleCrossing also experimented successfully with other satellite services, including birds that give it global reach. And it can buy more satellite capacity with a phone call, Wahba says.

"That's really the beauty of our system in comparison to others who want to be in this business—I won't name any names. They put satellites in the sky and hope they sell the customers. For us, demand comes first. As we pick up the customers we go and get the bandwidth."

TeleCrossing uses satellite base stations in each market and then distributes bandwidth to end customers using frequency-hopping spread spectrum wireless technology operating in the unlicensed 2.4GHz band.

The company has experimented with a number of radio equipment vendors including Nokia and WaveLAN. Cisco is also a major supplier of wireless equipment.

Growth projections

TeleCrossing expects to deploy 200 fixed wireless distribution points by August 2001, 800 by the end of 2002. It's not clear how many satellite base stations this involves, and the company is guarded about where it will deploy first.

Financing so far is all internal—"call it family money," Wahba says. The company recently finalized a new business plan, however, and is now actively talking to outside investors. He will consider going public if the market remains favorable, Wahba says.

Exploring partnership arrangements

How might TeleCrossing work with an ISP? First, the company will supply all the radio and satellite network infrastructure itself. It

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is considering a number of possible business models.

Most will involve the ISP buying or leasing gateway equipment worth between \$10,000 and \$15,000—although Wahba notes that if an ISP can deliver a large enough guaranteed customer base, his company will consider covering these costs as well.

And it will consider models that involve the ISP collecting revenues directly from the customer and paying a fee based on bandwidth used, or TeleCrossing billing the customer and sharing revenues with the ISP.

As always in these columns, we're not advocating TeleCrossing over other wireless alternatives for ISPs. Indeed, the company's legacy of failure in the DTH market is no great recommendation.

But the end-to-end wireless concept is at least intriguing and it sounds like TeleCrossing is nothing if not flexible in its approach to dealing with ISPs. We figure it's at least worth a look-see.

—End

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Wednesday June 6, 7:33 am Eastern Time

Press Release

AlphaStar Provides Direct Backbone Connectivity Via Satellite Broadband to ISP'S, Fixed Wireless Operators, Cable TV, Rural Telco's, Office Buildings, Corporations and Other Commercial Users

GREENWICH, Conn.--(BUSINESS WIRE)--June 6, 2001--AlphaStar International is providing satellite broadband access direct to commercial and institutional users as part of the service offerings by www.alphastar.com

The service is called SkyCrossing Direct and it provides access directly from satellites to dishes mounted at the user's premises. SkyCrossing provides "Broadband Backbone in The Sky" based on the innovative and affordable technology of Bandwidth-On-Demand ("BOD"), rather than the traditional and expensive Single Channel Per Carrier technology ("SCPC"). SkyCrossing provides an "Always On" two-way satellite broadband connection with speeds up to 33 Mbps and beyond.

The SkyCrossing Direct Service:

targets geographical areas that are unserved and underserved by terrestrial networks.
SkyCrossing connects the unconnected.

provides redundancy and back up to primary fiber connections in areas where landlines are available. SkyCrossing protects the connected.

avoids the congested terrestrial network and the landline local loop.

allows for deployed within days with maximum flexibility and minimum cost.

Many broadband providers find themselves between a rock and a hard place - dependent on their competitors for backbone connectivity. The result, as witnessed during the last few months is that both the broadband providers and their customers suffer. SkyCrossing provides the answer by bypassing fiber and phone companies entirely, from the first mile to the last mile. SkyCrossing provides full service solutions to corporations, office buildings, MDU's, government agencies, non-profit organizations, educational institutions, fixed wireless and MMDS operators, cable TV MSO's, rural Telco's, ISP's and ASP's among others.

SkyCrossing is available within the footprint of General Electric Americom satellite GE-5 and GE-6 covering the USA, Canada, Latin America and the Caribbean. Later this summer the service will include Europe, the Middle East and Africa. SkyCrossing can cover the entire globe with one satellite hop.

SkyCrossing pricing is both fair and innovative. Most satellite data carriers today offer prices based on SCPC technology and the customers pay for bandwidth whether they use it or not. This is waste of satellite bandwidth and money. SkyCrossing pricing is based on the new BOD technology that prices on actual use only. Why pay for a whole loaf, when you only need a slice? And why should an average user subsidize a heavy user?

SkyCrossing Direct basic packages start at speeds up to 512 kbps downstream and 128kbps upstream with an allotment of 2GB per month for \$299 per month. Customer pays incrementally, per one MB for any bandwidth use in excess of the monthly allotment. Other packages with higher data rates and volumes are also available. Service packages and prices are posted at: www.skycrossing.net.

SkyCrossing's mission is to be the most innovative and least cost satellite broadband provider. In August 2000, SkyCrossing deployed an innovative residential 2-way satellite broadband service. SkyCrossing is expanding its residential service by deploying in five additional markets. The residential service is based on a hybrid model integrating satellite broadband as a backbone and fixed wireless as the final mile. SkyCrossing residential service is priced at \$49.99 per month with speeds up to 512 kbps downstream/144 kbps upstream.

SkyCrossing is the lowest cost satellite broadband provider today with the lowest risk. Recent news reports indicate that many of the projects announced to provide satellite broadband sometime in the future and requiring billions of dollars to deploy and operate, are having difficulty finding financial sponsors. SkyCrossing does not believe in the notion that "when you build it, they will come". SkyCrossing's system is designed to minimize risk, as costs are rather low and incremental by design, therefore customer demand precedes capital expenditures, and operating costs. Furthermore, SkyCrossing is providing satellite broadband service today, not years in the future.

[email contact](mailto:teleport@alphastar.com)

teleport@alphastar.com

www.alphastar.com

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Monday June 5, 7:33 am Eastern Time

Company Press Release

AlphaStar Demonstrate A Broadband Network Integrating Two-way Satellite with Cisco Wireless Technology

ATLANTA--(BUSINESS WIRE)--June 5, 2000--AlphaStar International. (www.alphastar.com)

(Greenwich, CT) announced the successful completion of a demonstration of an Internet Broadband network integrating two-way satellite and wireless local access. The demonstration integrated AlphaStar's two-way satellite global coverage with Cisco System's wireless technology.

Last month, AlphaStar announced the deployment of a high speed Internet and intranet broadband network called www.alphastar.com TeleCrossing Introduced a hybrid technology integrating for the first time two-way satellite global coverage with a network of wireless local access hubs. TeleCrossing provides Internet broadband access that is always on, dedicated and fully interactive with high speed up to 32 Mbps in an increment or fraction of 2 Mbps, symmetrical or asymmetrical.

TeleCrossing began deployment and marketing in selective residential and business markets. By the end of the year 2000 the company will deploy 400 wireless local hubs and connect them all together via satellite as one network. According to Mahmoud Wahba, president and founder of TeleCrossing, "The pace of deployment will accelerate dramatically in the following years and will include a major global expansion." Wahba states further, "The services will be price competitive with DSL and Cable modem for both business and residential Internet users. In some markets the monthly fees will start as low as \$29.95 without additional payments for local Internet access." All the subscriber needs is a radio antenna connected by a small modem to desktop computers, laptops, set-top boxes, printers, fax machines or scanners. All high-speed broadband applications will be available including streaming, multimedia and video on demand (VOD). Wahba states, "The company is seeking strategic partners to offer the services via handheld and mobile computing and entertainment devices."

Integrating satellites with wireless local access has many advantages. The network covers both global and local geographical areas anywhere. It originates, aggregates and distributes both global and local content at truly high speed uploading and downloading. TeleCrossing can be deployed quickly with flexibility and affordability. The all-wireless network allows mobility of Internet access and the use of computing and entertainment handheld devices for future growth.

TeleCrossing bypasses the congested terrestrial backbone and the phone carriers entirely. The network offers a dedicated private and secure line to each Internet user. Additionally, for intranet and business users, TeleCrossing offers several configurations of Virtual Private Network (VPN) that can be encrypted and completely secured by the use of conditional access. Two-way-satellite uses a small dish at the wireless local hub to send and receive broadband content without the need for the phone line for a return path. TeleCrossing eliminates the need for a residential satellite dish on the roof or the ground of the subscriber's home. As a result the network can be installed at the subscriber's home easily and requires little or no maintenance (Say goodbye to the residential satellite dish everywhere!)

TeleCrossing offers an immediate and more reliable alternative to cable modem and DSL in urban, suburban and rural markets. TeleCrossing marketing objectives are to target Internet and intranet users who are a) unserved, b) underserved, c) dissatisfied with cable or DSL services or, d) the disenfranchised who fall in the digital divide. Cable penetrates only 64% of American households while DSL can only reach one third of internet users due to distance limitations. TeleCrossing can reach geographically remote areas or areas that are rendered virtually remote due to the lack or insufficiency of fiber and cable network, whether these be urban, suburban and rural areas. For example, many of the suburbs of New York City are rendered virtually remote because of the weakness of the fiber or cable infrastructure. Try to get DSL in parts of Greenwich, CT or use cable after 6 pm in Scarsdale NY, or Fort Lee, NJ. Some of the Internet users in well-served markets are concerned with sharing bandwidth with their neighbors and the possible breach of security or privacy when they use cable modem. DSL users, on the other hand, are concerned with the complexity of wire installation, the entanglement with the phone companies and speed fluctuations and unpredictability. At the other extreme, a recent study showed that in the USA, there are 12 states that are at the risk of falling behind the rest of the country due to the lack of fiber hubs for broadband access. They were named the "Disconnected Dozen." They include the states of Alabama, Arkansas, Idaho, Iowa, Maine, Montana, New Hampshire, North Dakota, Oklahoma, South Dakota, West Virginia and Wyoming. Most countries of the world lack a terrestrial backbone and cannot deploy it. TeleCrossing can provide an immediate and economical broadband solution to these "disconnected" markets both in the USA and globally.

About AlphaStar International

AlphaStar is one of the original four Direct-To-Home (DTH) satellite television broadcasting companies, including DirecTV, Echo Star, PrimeStar and AlphaStar. The company now specializes in Internet and intranet Broadband content origination, aggregation, multimedia data storage, streaming media services and distribution via both fiber and satellite live 24/7 or on demand.

AlphaStar's teleport, located in Oxford, Connecticut, on twelve acres is one of only a dozen Ku-band facilities in the world specializing in video and multimedia with extensive capacity and scalability. (For a view go to tour our teleport, www.telecrossing.net.) The teleport allows the Downlinking and Uplinking of satellite feeds using Ku, C bands and Vsat connections and the reception via a small dish. Additionally, the teleport is connected by 24 dark fibers to the terrestrial backbone of the Internet allowing the delivery of multiple terabit and beyond. The

teleport has been fully licensed by the FCC since 1996. The teleport cannot be replicated without spending tens of millions of dollars and considerable time to obtain zoning permits and construction, creating an immediate barrier to entry. Built on a mountaintop as part of President Reagan's "Star Wars" program, it was intended originally to protect the US by tracking the former Soviet Union's satellites. As a result the teleport is geographically located where it can downlink and uplink satellite feeds from most countries around the globe. The Teleport is capable of broadcasting and streaming tens of thousands of TV and multimedia channels and providing all teleport services and Internet broadband applications.

Email contact

teleport@alphastar.com

www.alphastar.com

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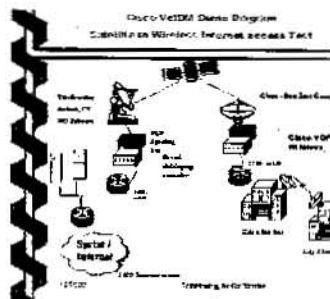
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